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16 **UNITED STATES DISTRICT COURT**

17 **CLARK COUNTY, NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST  
19 COMPANY, as Trustee for SECURITIZED  
20 ASSET BACKED RECEIVABLES LLC  
21 TRUST 2006-WM4,

22 Plaintiff,  
23 vs.  
24 BFP INVESTMENTS 2, LLC,

25 Defendant.

26 Case No. 2:16-cv-02895-JAD-VCF

27 **STIPULATION AND ORDER TO  
28 EXTEND TIME FOR BFP  
INVESTMENTS 2, LLC TO RESPOND TO  
MOTION TO CONTINUE DISCOVERY  
DEADLINES [ECF No. 50]**

29 **(First Request)**

30 Plaintiff Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed  
31 Receivables LLC Trust 2006-WM4 (“Deutsche Bank”) and BFP Investments 2, LLC (“BFP”)  
32 (collectively the “Parties”), by and through their respective undersigned counsel of record, hereby  
33 stipulate and agree to allow BFP an additional two (2) days to file its response to Deutsche Bank’s  
34 Motion to Continue Discovery Deadlines [ECF No. 50]. Specifically, the Parties stipulate to the  
35 following:

36 1. BFP’s current deadline to file a Response to Deutsche Bank’s Motion to Continue  
37 Discovery Deadlines [ECF No. 50] is June 11, 2020.  
38 2. The Parties agree that BFP may have an extension of two (2) days or until June 15, 2020  
39 to file its response.

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1       3. BFP seeks this extension due to counsel's involvement in a Ninth Circuit oral argument  
2                    that took place on June 9, 2020 and a Nevada Supreme Court oral argument that takes place  
3                    June 11, 2020.  
4       4. This is the first request for an extension of time.  
5       5. The Parties stipulate to the foregoing in good faith and not for purposes of delay.

6  
7                    DATED this 11th day of June, 2020.

8                    **KIM GILBERT EBRON**

9                    /s/ Karen L. Hanks

10                   Jacqueline A. Gilbert, Esq.  
11                   Nevada Bar No. 10593  
12                   Diana S. Ebron, Esq.  
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16                   Attorney for BFP Investments, 2 LLC

17                   DATED this 11th day of June, 2020.

18                   **WRIGHT, FINLAY & ZAK, LLP**

19                   /s/ Robert A. Riether

20                   Robert A Riether, Esq.  
21                   Nevada Bar No. 12076  
22                   7785 W. Sahara Ave., Suite 200  
23                   Las Vegas, NV 89117  
24                   Attorney for Deutsche Bank

25                     
26                   IT IS SO ORDERED.

27                   UNITED STATES MAGISTRATE JUDGE

28                   DATED: 6-11-2020

Respectfully submitted by:

22                   **KIM GILBERT EBRON**

23                   /s/ Karen L. Hanks

24                   Jacqueline A. Gilbert, Esq.  
25                   Nevada Bar No. 10593  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of March, 2018, pursuant to FRCP 5, I served via the Court's CM/ECF filing and service the foregoing **BFP INVESTMENTS 2, LLC'S  
OPPOSITION TO DEUTSCHE BANK NATIONAL TRUST COMPANY'S MOTION TO  
LIFT STAY [ECF NO. 35]; AND COUNTERMOTION TO CONTINUE STAY OF ALL  
PROCEEDINGS PENDING RESOLUTION OF CERTIFIED QUESTION** to the following parties:

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Deutsche Bank National Trust Company  
Trust 2006-WM4*

*/s/ Alexander Loglia*  
An employee of KIM GILBERT EBRON